



STATE OF DELAWARE

**PUBLIC SERVICE COMMISSION**  
861 SILVER LAKE BLVD.  
CANNON BUILDING, SUITE 100  
DOVER, DELAWARE 19904

TELEPHONE: (302) 736-7500  
FAX: (302) 739-4849

June 11, 2019

Laura Zepeda  
AGR Group Nevada, LLC  
6275 South Pearl Street  
Suite 100  
Las Vegas, NV 89120

**Re: In The Matter of the AGR Group Nevada, LLC For A Certificate to Provide Electric Supply Services within the State Of Delaware (Submitted May 24, 2019) - PSC Docket No. 19-0993**

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Dear Ms. Zepeda,

The Delaware Public Service Commission ("Commission") is in receipt of the application (the "Application") submitted by AGR Group Nevada, LLC ("Company") for certification to broker electric supply services in Delaware. The Application is incomplete as filed and additional information is necessary to complete the minimum filing requirements ("MFRs"), as indicated below:

**Section 2.2.2 State of Formation Certificates**

- Please provide a business license from the state of formation.

**Section 2.2.3 Authorization**

- Please submit a Delaware business license.
  - Please include the permanent copy, not the temporary.

**Section 2.2.9 Toll-Free Number**

- Please provide a toll free customer service number.

**Section 2.2.11 Consent to Jurisdiction**

- Question 11 was not completed with the signature of an officer of the Company.

**Section 2.2.16 Financial Ability**

- Please provide an Income Statement and Statement of Cash Flows that are dated within 12 months from the filing of the Application.

**Section 2.2.19 Retail Experience**

- Question 16 was not completed. Please provide a description of the nature of the business the Applicant intends to conduct in the state of Delaware.
- Please provide professional résumés for Matt Judkin and Adolfo Quintero complete with company names, dates employed, and duties performed. Also, please include the institution where each completed their education, the degree obtained, and the year the degree was obtained.
- The Company has provided registration letters to provide telemarketing services for the states of New Hampshire, Pennsylvania, and Rhode Island.
  - Is the Company required to register with the utility commissions in the above states?

- If not, please provide proof.
- Please explain the oversight capabilities each state's utility commission has over the business that the Company conducts in its jurisdiction.

**Section 2.2.13 Marketing Plans and Materials**

- Please provide a description of the marketing plans and methods the Company intends to use.
- Please identify any third party vendors the Company intends to use.
- Please explain the oversight, training, and compliance the Company intends to employ among its representatives in the state of Delaware.
- Please provide copies of all marketing materials to be used in the state of Delaware.

**Section 2.1.6 Verification of Application**

- Please provide a signed, sworn statement of verification for each subsequent filing in this docket.

The Company may request that the Commission provide confidential treatment to some or all of the information contained in a document. When requesting confidential treatment for documents filed with the Commission, please simultaneously file a redacted, public version of the same document and an attestation that the information is not subject to inspection or disclosure to the public.

Staff respectfully requests a response to this notice of deficiency on or before July 12, 2019. Please note that 26 *Del. Admin. C.* § 3001 (the "Supplier Rules") section 2.4 provides that incomplete applications will be closed four (4) months after the filing date. If the application is not completed within the four (4) month time frame the applicant forfeits their application filing fee and must resubmit the application with an additional filing fee. The responses and verifications can be uploaded as a subsequent filing in DelaFile under Docket No 19-0933.

Should you have any questions or if I can be of any assistance you may contact me at (302) 736-7539 or send questions by email to [Clishona.Marshall@delaware.gov](mailto:Clishona.Marshall@delaware.gov).

Sincerely,

*Shona Marshall*  
Shona Marshall  
Public Utility Analyst

CC: Ms. Donna Nickerson, Commission Secretary  
Ms. Malika Davis, Public Utility Analyst